

Exhibit I

From: Gulay, Erol
Sent: Friday, August 20, 2021 6:58 PM
To: 'Tenreiro, Jorge'; Guo, Joy; Waxman, Daphna A.; Zornberg, Lisa; 'Levander, Samuel'; 'Tatz, Nicole'; 'mflumenbaum@paulweiss.com'; 'mgertzman@paulweiss.com'; 'Dearborn, Meredith (mdearborn@paulweiss.com)'; 'Linsenmayer, Robin (rlinsenmayer@paulweiss.com)'; 'Bunting, Kristina' (kbunting@paulweiss.com)'; 'mkellogg@kelloggghansen.com'; 'rfigel@kelloggghansen.com'; 'Oppenheimer, Bradley E. <boppenheimer@kelloggghansen.com> (boppenheimer@kelloggghansen.com)'; 'Pfeffer, Eliana M. (epfeffer@kelloggghansen.com)'; 'White, Collin R.' (cwhite@kelloggghansen.com)'; Gressel, Anna; Ford, Christopher S.; Ceresney, Andrew J.; 'Solomon, Matthew'; 'Janghorbani, Alexander'; 'Bamberger, Nowell D.'
Cc: Daniels, Jon; Moye, Robert M.; Hanauer, Benjamin J.; Stewart, Ladan F; Guerrier, Pascale; Sylvester, Mark
Subject: RE: SEC v Ripple; August 5 Meet and Confer

Counsel,

We write to follow up on certain topics discussed during the August 18 meet and confer and to address Daphna's email from today.

Recordings. Based on a search of all recorded meetings by custodian and meeting name, Ripple identified a set of potentially responsive recordings in addition to the ones you specifically identified in your email of Aug. 13. Ripple agrees to review this set of potentially responsive recordings and will aim to produce any recordings that are responsive and not privileged by Aug. 31. While our search included all-hands meetings, we were not able to determine their potential responsiveness based on meeting name or custodian alone, and we confirmed that agenda documents for such meetings do not exist.

Confluence. Ripple agrees to search Confluence for any documents posted or edited by the 33 custodians and aims to produce documents that are responsive and not privileged by Aug. 31.

Notes. Ripple is in the process of confirming whether Ripple maintains repositories of hard copy notes for custodians who are former employees. Ripple is also in the process of confirming the existence of any responsive notes taken by current employees David Schwartz, Ethan Beard, and Monica Long. Ripple will aim to produce any responsive, non-privileged notes by Aug. 31.

Llyr Communications with Exchanges. Ripple will provide by the end of next week a list of the platforms to which Llyr expressed Ripple's views as to the legal status of XRP, after a search in our current collection.

Thanks,
Erol